

BRAFMAN & ASSOCIATES, P.C.

ATTORNEYS AT LAW

767 THIRD AVENUE, 26TH FLOOR

NEW YORK, NEW YORK 10017

TELEPHONE: (212) 750-7800

FACSIMILE: (212) 750-3906

E-MAIL: ATTORNEYS@BRAFLAW.COM

BENJAMIN BRAFMAN

MARK M. BAKER
OF COUNSEL

MARC A. AGNIFILO
OF COUNSEL

ANDREA L. ZELLAN
JOSHUA D. KIRSHNER
JACOB KAPLAN
TENY R. GERAGOS
ADMITTED IN NY & CA
STUART GOLD

April 10, 2018

VIA ECF

The Honorable Nicholas G. Garaufis
United States District Judge
United States District Court
225 Cadman Plaza East
Brooklyn, NY 11201

Re: United States v. Keith Raniere, 18 Cr. 204 (NGG)

Dear Judge Garaufis:

We write to renew our requests for a Witness List and Case-in-Chief Trial Exhibits from the government. (See Dkts. 422, 456.) We request marked exhibits, the government's exhibit list, and their witness list by **Monday, April 15, 2019**. This Court already has ordered the government to complete their production of Jencks Act materials by April 12, 2019, and ordered motions in limine to be briefed on April 17, 2019. However, most respectfully, it would be a waste of the Court's time and resources for us to make motions in limine regarding evidence that the government is not going to offer. Therefore, having the government's Witness List and Trial Exhibits two days before the motions in limine deadline will allow us to make directed motions on April 17th in regard to the actual evidence the government intends to offer.

Respectfully submitted,



Marc A. Agnifilo
Teny R. Geragos

cc: All Counsel (via ECF)